

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MICHELLE E. CROWE; :
MATTHEW T. HOOVER; :
TYLER FRANKLIN; and : CA No. 2:11-cv-00689
MICHAEL RYAN JOHNSON, :
Plaintiffs, : Judge William L. Standish
v. :
GLOBAL FITNESS HOLDINGS, : ELECTRONICALLY FILED
LLC, :
Defendant. :
:

**MOTION FOR ADMISSION OF ATTORNEY PHILIP C. ESCHELS
TO THE BAR OF THIS COURT PRO HAC VICE**

Defendant, Global Fitness Holdings, LLC (“GFH”), through their undersigned counsel, hereby moves for an Order admitting Philip C. Eschels, Esquire, to appear and practice *pro hac vice* in this case. In support of its Motion, GFH states as follows:

1. As set forth in his Certification, attached as Exhibit A, Mr. Eschels is an attorney in the law firm of Greenebaum Doll & McDonald, PLLC, whose offices are located at 101 South Fifth Street, 3500 National City Tower, Louisville, Kentucky 40202.

2. Mr. Eschels is a member in good standing of the bar of the Commonwealth of Kentucky and the State of Indiana. He is admitted to practice before the Kentucky Supreme Court, the Indiana Supreme Court, the U.S. District Courts for the Western and Eastern Districts of Kentucky, the U.S. District Court for the Southern District of Indiana and United States Court of Appeals for the Sixth Circuit. There are no pending disciplinary proceedings against Mr. Eschels in any state or federal court.

3. The undersigned counsel, Erin J. McLaughlin, of the law firm of Buchanan Ingersoll & Rooney PC, is qualified to practice in this Court and makes this Motion.
4. GFH has requested that Mr. Eschels represent it in this litigation.
5. Mr. Eschels is willing to submit to the jurisdiction of the Court and comply with all of its rules and procedures.
6. Mr. Eschels is familiar with the facts and circumstances of this action, and the local rules of this Court.
7. Mr. Eschels is a registered user of ECF in the United States District Court for the Western District of Pennsylvania.
8. The required fee is being submitted with this motion.

WHEREFORE, Defendant GFH respectfully requests the *pro hac vice* admission of attorney Philip C. Eschels to this Court for this action.

Dated: July 8, 2011

Respectfully submitted,

/s/ Erin J. McLaughlin

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